

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF  
THE KINGDOM OF DENMARK (SKAT) TAX  
REFUND SCHEME LITIGATION

This document relates to all actions.

MASTER DOCKET

18-md-2865 (LAK)

**STIPULATION AND [PROPOSED] ORDER**

WHEREAS, Plaintiff SKAT, which is the Customs and Tax Administration of the Kingdom of Denmark (“SKAT”), has sued the Defendants and their representatives in the above-captioned multidistrict litigation;

WHEREAS, Plaintiff SKAT filed a Motion for Issuance of a Request for International Judicial Assistance to Obtain Evidence (the “Motion”) on November 30, 2018 (Dkt. Nos. 39-41);

WHEREAS, under the Local Civil Rules for the Southern District of New York, Defendants’ opposing affidavits and answering papers must be served within seven days of service of the moving papers, and Plaintiff’s reply affidavits and memoranda of law must be served within two days after service of the answering papers;

WHEREAS, on December 5, 2018, the parties filed a Stipulation and Proposed Order agreeing to extend Defendants’ time to respond to the Motion to December 14, 2018 and SKAT’s time to reply in support of the Motion to December 21, 2018 (Dkt. No. 43), and on December 7, 2018, the Court entered that stipulation and proposed order (Dkt. No. 47);

WHEREAS, the parties are continuing to confer in good faith regarding the scope of SKAT’s proposed Letter of Request for International Judicial Assistance (“Letter of Request”)

(Dkt. No. 41-1) (filed under seal) and are discussing potential revisions to the Letter of Request; and

WHEREAS, the parties believe that an additional extension would provide them with the necessary time to complete their negotiations in an attempt to resolve any objections to the Letter of Request.

NOW, IT IS HEREBY STIPULATED AND AGREED, by and between the parties that Defendants' deadline to respond to the Motion is extended to December 21, 2018, and SKAT's reply shall be filed by January 4, 2019.

Dated: New York, New York  
December 13, 2018

CAPLIN & DRYSDALE, LLP

By: /s/ Mark D. Allison  
Mark D. Allison  
Zhanna A. Ziering  
600 Lexington Avenue  
New York, NY 10022  
Tel: (212) 379-6060  
Fax: (860) 493-6290  
E-mail: mallison@capdale.com

HUGHES HUBBARD & REED LLP

By: /s/ Sarah L. Cave  
William R. Maguire  
Marc A. Weinstein  
Sarah L. Cave  
John T. McGoeys  
Hughes Hubbard & Reed LLP  
One Battery Park Plaza  
New York, NY 10004-1482  
Tel.: (212) 837-6000  
Fax: (212) 422-4726  
Email: Sarah.cave@hugheshubbard.com

*Attorneys for Plaintiff*

HANAMIRIAN LAW FIRM, P.C.

By: /s/ John Hanamirian  
John Hanamirian  
30 Wall St.  
New York, NY 10005  
Tel: (856) 793-9092  
E-mail: [jmh@hanamirian.com](mailto:jmh@hanamirian.com)

MORVILLO ABRAMOWITZ GRAND  
IASON & ANELLO PC

By: /s/ Edward M. Spiro  
Edward M. Spiro  
Audrey Feldman  
565 5th Ave.  
New York, NY 10017  
Tel: (212) 856-9600  
E-mail: [espiro@maglaw.com](mailto:espiro@maglaw.com)

WILLIAMS & CONNOLLY LLP

By: /s/ Stephen Andrews  
Stephen Andrews  
Amy B. McKinlay  
725 Twelfth Street, N.W.  
Washington, D.C. 20005  
Tel: (202) 434-5291  
E-mail: [SAndrews@wc.com](mailto:SAndrews@wc.com)

KOSTELANETZ & FINK, LLP

By: /s/ Bryan C. Skarlatos  
Bryan C. Skarlatos  
Eric Smith  
250 Greenwich St.  
New York, NY 10007  
Tel: (212) 808-8100  
E-mail: [bskarlatos@kflaw.com](mailto:bskarlatos@kflaw.com)

GUSRAE KAPLAN & NUSBAUM PLLC

By: /s/ Martin H. Kaplan  
Martin H. Kaplan  
J. Christopher Albanese  
120 Wall Street  
New York, NY 10005  
Tel: (212) 379-6060  
E-mail: mkaplan@gusraekaplan.com

DEWEY, PEGNO & KRAMARSKY

By: /s/ Thomas E.L. Dewey  
Thomas E.L. Dewey  
David S. Pegno  
777 Third Avenue  
New York, NY 10017  
Tel: (212) 943-9000  
E-mail: tdewey@dpklaw.com

LAW OFFICE OF SHELDON S. TOLL PLLC

By: /s/ Sheldon S. Toll  
Sheldon S. Toll  
29580 Northwestern Hwy., Ste. 1000  
Southfield, MI 48034  
Tel: (248) 797-9111  
E-mail: sst@lawtoll.com

SEWARD & KISSEL LLP

By: /s/ Mark J. Hyland  
Mark J. Hyland  
One Battery Park Plaza  
New York, NY 10004  
Tel: (212) 574-1200  
E-mail: hyland@sewkis.com

K&L GATES LLP

By: /s/ John C. Blessington  
John C. Blessington  
One Lincoln Street  
Boston, MA 02111  
Tel: (617) 261-3108  
E-mail:john.blessington@klgates.com

*Attorneys for Defendants*

SO ORDERED:

U.S. District Judge Lewis A. Kaplan